

LESSON 9

Reviews

You will recall that contractors are obligated by their execution of the DD Form 441, "Department of Defense Security Agreement," to preserve and maintain the security of the United States through the prevention of improper disclosure of classified information. This formidable task requires contractor compliance with the requirements of the National Industrial Security Program Operating Manual (NISPOM). As you learned, the NISP is administered through the Defense Security Service (DSS) acting for the Department of Defense and the other User Agencies. DSS reviews the contractor facilities and provides service to User Agencies through evaluation and verification that classified information placed into the hands of industry is being adequately safeguarded.

OBJECTIVES

At the end of this lesson you should be able to do the following:

- List examples of events that may lead DSS to conduct a security review of a facility.
- State the normal time intervals for key DSS and contractor actions.
- Describe the involvement by the GCA in the areas of pre-review research and unsatisfactory review ratings.

INITIAL REVIEW

The initial review of a facility is conducted within 60 days of the FCL being issued or within 20 days of receipt of classified material. The first review is to ensure proper implementation of the security requirements and to verify the safeguarding capability of the facility. It usually takes the form of an advice and assistance visit.

APERIODIC GOVERNMENT REVIEWS

The aperiodic government review is a tool used to assess the effectiveness of the contractor's security systems and to assist the contractor in directing its resources toward the most efficient security solutions.

FREQUENCY

How often are government reviews conducted at a facility? It all depends. Security reviews are not only conducted based on the passage of time but also other events. Normally there is a 1 year period for possessing facilities and 18 months for non-possessing facilities. Events, which would require that DSS to conduct more frequent reviews, could include:

- New counterintelligence information indicating a new or increased threat to the facility or its technologies

- Changes in the scope of the facility's classified operations
- The departure of the FSO
- User Agency concerns major or repeated security violations indicating classified information is in jeopardy
- The introduction of FOCI or significant changes to current FOCI, foreign nationals visiting or assigned to the facility
- And significant international involvement, to name a few.

REVIEW TECHNIQUES

Depending upon the size and complexity of the facility, one or more IS Reps may conduct the review. The time required conducting a review range from several hours for a small access facility to several days for a large facility, particularly those who possess TOP SECRET, COMSEC, and other highly sensitive material.

Under a recent change, the DSS will attempt to contact the program manager at the GCA before the review. The IS Rep will inquire about various aspects of the contract with the FSO, such as the release of classified hardware and classified visits. In this way, the IS Rep has a better understanding of the activity at the facility prior to arriving for the review.

When the IS Rep arrives at the facility, an entrance briefing is conducted with upper management. The IS Rep discusses the upcoming review with management and briefs them on the areas the IS Rep will look at during the review.

COMPLETION OF THE REVIEW

At the completion of the review the IS Rep conducts an exit briefing with the FSO. The IS Rep discusses each problem area with the FSO. Following this briefing, the IS Rep will provide an overview of the review results to top management. If necessary, a follow-up letter will be sent to the facility listing those areas that were not corrected during the review. The facility normally has 30 days to correct these areas.

The GCA is normally not contacted regarding the results of the review. It will be contacted, however, should the facility receive an "unsatisfactory" rating. This rating is given to a facility that is unwilling or unable to adequately safeguard classified information. The GCA then decides whether or not the facility will continue to perform on current classified contracts.

No new classified contracts should be awarded until the "unsatisfactory" conditions have been corrected. DSS will continue to work with the facility during this period in an attempt to correct the problems, which resulted in the "unsatisfactory" rating.

SUMMARY

Contractors are entrusted with the protection of classified information from unauthorized disclosure, and the DSS is entrusted to verify this protection through the security review process. Industrial security reviews are conducted to assist industry in fulfilling the NISP requirements. It is therefore the uniform application of these requirements, the conduct of quality of the in-depth reviews, and the timely exchange of information between activities, that the GCA is assured that their classified information within industry is adequately safeguarded.

REVIEW EXERCISES

Complete the following exercises for review and practice. Multiple choice questions may have one or more correct choices.

1. An initial review of a cleared facility is normally conducted within 60 days of the FCL being issued. However, should the facility receive classified material within that time period the DSS Field Office will inspect the facility within:
 - a) 15 days
 - b) 20 days
 - c) 30 days
 - d) 45 days
2. List three events that may cause DSS to conduct a security review of a facility.
 - a.
 - b.
 - c.
3. The contractor within should correct problems cited in review follow-up letter:
 - a. 10 days
 - b. 15 days
 - c. 30 days
 - d. 60 days
4. The User Agency will always be notified when a facility receives an "unsatisfactory" review rating.

True
False
5. An "unsatisfactory" review rating is given when a facility:
 - a. Has no classified contracts
 - b. Is unable or unwilling to safeguard classified information
 - c. Is unable to facilitate an unannounced review
 - d. None of the above

ANSWERS

1. *b* (p. 9-1)
2. *Any three of the events listed on p. 9-1, 2. (p. 9-1, 2).*
3. *c* (p. 9-2)
4. *True* (p.9-2)
5. *b* (p. 9-2)